

CAROLYN S. WALL  
O'MELVENY & MYERS LLP  
Times Square Tower  
7 Times Square  
New York, New York 10036-6524  
Telephone: (212) 326-2000  
Facsimile: (212) 326-2061

Attorney for Defendant

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

VERIFY SMART CORP.,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION,

Defendants.

Civil Action No. 14-5117 (KSH)

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant Bank of America, National Association ("BANA") and Plaintiff Verify Smart Corp. ("Verify") enter into this Stipulation to extend BANA's time to respond to Verify's complaint.

On August 14, 2014, Verify filed a Complaint, and on September 3, 2014, Verify served that Complaint on BANA, setting the time for BANA to move, answer, or otherwise respond to the Complaint by September 24, 2014.

IT IS HEREBY STIPULATED AND AGREED by the parties through their respective counsel, that the deadline for Defendant BANA to respond to Verify's Complaint is extended to

October 24, 2014. No previous extension has been requested or obtained.

**STIPULATED BY AND BETWEEN:**

/s/ Jean-Marc Zimmerman  
Zimmerman, Weiser & Paray LLP  
226 St. Paul Street  
Westfield, New Jersey 07090  
Ph: (908) 654-8000  
Fx: (908) 654-7207  
[jmz@zwpllp.com](mailto:jmz@zwpllp.com)

*Attorney for Plaintiff*


/s/ Carolyn S. Wall  
Carolyn S. Wall  
O'Melveny & Myers LLP  
Times Square Tower  
7 Times Square  
New York, New York 10036-6524  
Ph: (212) 326-2000  
Fx: (212) 326-2061  
[cwall@omm.com](mailto:cwall@omm.com)

*Attorney for Defendant*

Dated: September 16, 2014

**SO ORDERED:**

September 17, 2014

  
Cathy L. Waldor, U.S.M.J.